

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

AGWAY FARM & HOME SUPPLY, LLC,  
Debtor.<sup>1</sup>

Chapter 11

Case No. 22-10602 (JKS)

Objection Deadline: July 10, 2023 at 4:00 p.m. (ET)

Hearing Date: Scheduled only if Necessary

**NINTH MONTHLY APPLICATION FOR COMPENSATION AND  
REIMBURSEMENT OF EXPENSES OF PACHULSKI STANG ZIEHL & JONES LLP,  
AS COUNSEL FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
FOR THE PERIOD OF APRIL 1, 2023 THROUGH APRIL 30, 2023**

Name of Applicant:	Pachulski Stang Ziehl & Jones LLP
Authorized to Provide Professional Services to:	The Official Committee of Unsecured Creditors
Date of Retention:	July 20, 2022 by Order entered September 21, 2022
Period for which Compensation and Reimbursement is Sought:	April 1, 2023 – April 30, 2023
Amount of Compensation Sought as Actual, Reasonable and Necessary:	\$22,711.50
Amount of Expense Reimbursement Sought as Actual, Reasonable and Necessary:	\$42.30

This is a: ☒ monthly ☐ interim ☐ final application.

The total time expended for preparation of this monthly fee application is approximately 2 hours and the corresponding compensation requested is approximately \$2,000.00.

<sup>1</sup> The last four digits of the Debtor's federal tax identification number are 1247. The Debtor's address is 6606 W. Broad Street, Richmond, VA 23230.

**PRIOR MONTHLY APPLICATIONS FILED**

<b>Date Filed</b>	<b>Period Covered</b>	<b>Requested Fees</b>	<b>Requested Expenses</b>	<b>Approved Fees</b>	<b>Approved Expenses</b>
10.07.22	07.20.22 – 08.31.22	\$263,934.50	\$ 391.68	\$263,934.50	\$ 391.68
10.28.22	09.01.22 – 09.30.22	\$135,367.50	\$ 84.20	\$135,367.50	\$ 84.20
12.09.22	10.01.22 – 10.31.22	\$111,238.50	\$ 472.50	\$111,238.50	\$ 472.50
01.19.23	11.01.22 – 11.30.22	\$113,515.00	\$ 93.32	\$113,515.00	\$ 93.32
02.06.23	12.01.22 – 12.31.22	\$ 78,515.00	\$ 96.70	\$ 78,515.00	\$ 96.70
03.13.23	01.01.23 – 01.31.23	\$ 72,681.00	\$1,388.40	\$ 72,681.00	\$1,388.40
03.29.23	02.01.23 – 02.28.23	\$ 40,028.50	\$ 196.80	\$ 40,028.50	\$ 196.80
05.31.23	03.01.23 – 03.31.23	\$ 35,414.50	\$ 112.30	Pending	Pending

**PACHULSKI STANG ZIEHL & JONES LLP PROFESSIONALS**

<b>Name of Professional Individual</b>	<b>Position of the Applicant, Year of Obtaining License to Practice</b>	<b>Hourly Billing Rate</b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Bradford J. Sandler	Partner 1996	\$1,595.00	2.80	\$4,466.00
Paul John Labov	Partner, 2002	\$1,295.00	6.40	\$8,288.00
Colin R. Robinson	Counsel, 1997	\$1,095.00	8.80	\$9,636.00
Ian Densmore	Paralegal	\$545.00	0.20	\$109.00
Andrea R. Paul	Case Management Assistant	\$425.00	0.10	\$42.50
Karen S. Neil	Case Management Assistant	\$425.00	0.40	\$170.00

**Grand Total: \$22,711.50****Total Hours: 18.70****Blended Rate: \$1,214.50**

**COMPENSATION BY CATEGORY**

<b>Project Categories</b>	<b>Total Hours</b>	<b>Total Fees</b>
Case Administration	1.80	\$ 1,696.00
Compensation of Professionals	0.30	\$ 328.50
Compensation of Professionals / Other	1.30	\$ 1,573.50
General Creditors' Committee	2.00	\$ 2,420.00
Plan & Disclosure Statement	13.30	\$16,693.50
<b>Totals</b>	<b>18.70</b>	<b>\$22,711.50</b>

**EXPENSE SUMMARY**

<b>Expense Category</b>	<b>Service Provider<sup>2</sup> (if applicable)</b>	<b>Total Expenses</b>
Pacer – Court Research		\$23.90
Reproduction Expense		\$ 2.00
Reproduction / Scan Copy		\$16.40
<b>Total</b>		<b>\$42.30</b>

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<sup>2</sup> PSZ&J may use one or more service providers. The service providers identified herein below are the primary service providers for the categories described.

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

AGWAY FARM & HOME SUPPLY, LLC,  
  
Debtor.<sup>1</sup>

Chapter 11

Case No. 22-10602 (JKS)

**Objection Deadline: July 10, 2023 at 4:00 p.m. (ET)**  
**Hearing Date: Scheduled only if Necessary**

**NINTH MONTHLY APPLICATION FOR COMPENSATION AND  
REIMBURSEMENT OF EXPENSES OF PACHULSKI STANG ZIEHL & JONES LLP,  
AS COUNSEL FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
FOR THE PERIOD OF APRIL 1, 2023 THROUGH APRIL 30, 2023**

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Pursuant to sections 330 and 331 of Title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (collectively, the “Bankruptcy Rules”), and the Court’s *Order Establishing Procedures for Interim Compensation and Reimbursement of Professionals*, entered on August 3, 2022 [Docket No. 114] (the “Administrative Order”), Pachulski Stang Ziehl & Jones LLP (“PSZJ” or the “Firm”), counsel for the Official Committee of Unsecured Creditors (the “Committee”), hereby submits its *Ninth Monthly Application for Compensation and Reimbursement of Expenses for the Period of April 1, 2023 through April 30, 2023* (the “Application”).

By this Application, PSZJ seeks (i) a monthly interim allowance of compensation in the amount of \$22,711.50 and actual and necessary expenses in the amount of \$42.30 for a total allowance of \$22,753.80 and (ii) payment of \$18,169.20 (80% of the allowed fees pursuant to the Administrative Order) and reimbursement of \$42.30 (100% of the allowed expenses pursuant to the Compensation Procedures Order) for a total payment of \$18,211.50 for the period of April 1,

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<sup>1</sup> The last four digits of the Debtor’s federal tax identification number are 1247. The Debtor’s address is 6606 W. Broad Street, Richmond, VA 23230.

2023 through April 30, 2023 (the “Interim Period”). In support of this Application, PSZJ respectfully represents as follows:

**Background**

1. On July 5, 2022 (the “Petition Date”), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Debtor is operating its business and managing its property as a debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No request for the appointment of a trustee or examiner has been made in this chapter 11 case.

2. On July 18, 2022, the Office of the United States Trustee established the Committee pursuant to section 1102(a)(1) of the Bankruptcy Code, which currently is comprised of the following seven members: (i) The Scotts Company, LLC; (ii) Animal Health International, Inc.; (iii) Wildlife Sciences, LLC; (iv) Capital Forrest Products; (v) Gallagher North America, Inc.; (vi) Hub Group, Inc.; and (vii) American Wood Fibers, Inc.[Docket Nos. 118 and 289].

3. On August 3, 2022, the Court signed the Administrative Order, authorizing certain professionals (“Professionals”) to submit monthly applications for interim compensation and reimbursement for expenses, pursuant to the procedures specified therein. The Administrative Order provides, among other things, that a Professional may submit monthly fee applications. If no objections are made within ten (10) days after service of the monthly fee application the Debtor is authorized to pay the Professional eighty percent (80%) of the requested fees and one hundred percent (100%) of the requested expenses. Beginning with the period September 30, 2022, and at three-month intervals or such other intervals convenient to the Court, each Professional shall file

and serve an interim application for allowance of the amounts sought in its monthly fee applications for that period. All fees and expenses paid are on an interim basis until final allowance by the Court.

4. The retention of PSZJ, as counsel to the Committee, was approved effective as of July 20, 2022, by this Court's *Order Authorizing and Approving the Retention of Pachulski Stang Ziehl & Jones LLP as Counsel to the Official Committee of Unsecured Creditors, Effective as of July 20, 2022* [Docket No. 205] (the "Retention Order"). The Retention Order authorized PSZJ to be compensated on an hourly basis and to be reimbursed for actual and necessary out-of-pocket expenses.

#### **PSZJ'S APPLICATION FOR COMPENSATION AND FOR REIMBURSEMENT OF EXPENSES**

##### **Compensation Paid and Its Source**

5. All services for which PSZ&J requests compensation were performed for or on behalf of the Committee. PSZ&J has received no payment and no promises for payment from any source other than the Debtor for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Application. There is no agreement or understanding between PSZ&J and any other person other than the partners of PSZ&J for the sharing of compensation to be received for services rendered in this case. PSZ&J has not received a retainer in this case.

##### **Fee Statements**

6. The fee statement for the Interim Period is attached hereto as **Exhibit A**. This statement contains daily time logs describing the time spent by each attorney and

paraprofessional during the Interim Period. To the best of PSZJ's knowledge, this Application complies with sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules and the Administrative Order. PSZJ's time reports are initially handwritten or directly entered in the billing system, by the attorney or paralegal performing the described services. The time reports are organized on a daily basis. PSZJ is particularly sensitive to issues of "lumping" and, unless time was spent in one time frame on a variety of different matters for a particular client, separate time entries are set forth in the time reports. PSZJ's charges for its professional services are based upon the time, nature, extent and value of such services and the cost of comparable services other than in a case under the Bankruptcy Code. To the extent it is feasible, PSZJ professionals attempt to work during travel.

#### **Actual and Necessary Expenses**

7. A summary of the actual and necessary expenses incurred by PSZJ for the Interim Period is attached hereto as part of **Exhibit A**. PSZJ customarily charges \$0.10 per page for photocopying expenses related to cases, such as this, arising in Delaware. PSZJ's photocopying machines automatically record the number of copies made when the person that is doing the copying enters the client's account number into a device attached to the photocopier. PSZJ summarizes each client's photocopying charges on a daily basis.

8. PSZJ charges \$0.25 per page for out-going facsimile transmissions. There is no additional charge for long distance telephone calls on faxes. The charge for outgoing facsimile transmissions reflects PSZJ's calculation of the actual costs incurred by PSZJ for the machines, supplies and extra labor expenses associated with sending telecopies and is reasonable

in relation to the amount charged by outside vendors who provide similar services. PSZJ does not charge the Debtor for the receipt of faxes in this case.

9. With respect to providers of on-line legal research services (e.g., LEXIS and WESTLAW), PSZJ charges the standard usage rates these providers charge for computerized legal research. PSZJ bills its clients the actual amounts charged by such services, with no premium. Any volume discount received by PSZJ is passed on to the client.

10. PSZJ believes the foregoing rates are the market rates that the majority of law firms charge clients for such services. In addition, PSZJ believes that such charges are in accordance with the American Bar Association's ("ABA") guidelines, as set forth in the ABA's Statement of Principles, dated January 12, 1995, regarding billing for disbursements and other charges.

#### **Summary of Services Rendered**

11. The names of the timekeepers of PSZJ who have rendered professional services in this case during the Interim Period are set forth in the attached **Exhibit A**. PSZJ, by and through such persons, has prepared and assisted in the preparation of various motions and orders submitted to the Court for consideration, advised the Debtor on a regular basis with respect to various matters in connection with the Debtor's case, and performed all necessary professional services which are described and narrated in detail below. PSZJ's efforts have been extensive due to the size and complexity of the Debtor's case.



**Summary of Services by Project**

12. The services rendered by PSZJ during the Interim Period can be grouped into the categories set forth below. PSZJ attempted to place the services provided in the category that best relates to such services. However, because certain services may relate to one or more categories, services pertaining to one category may in fact be included in another category. These services performed, by categories, are generally described below, with a more detailed identification of the actual services provided set forth on the attached **Exhibit A**. **Exhibit A** identifies the attorneys and paraprofessionals who rendered services relating to each category, along with the number of hours for each individual and the total compensation sought for each category.

**A. Case Administration**

13. During the Interim Period, the Firm, among other things, reviewed correspondence and pleadings and forwarded them to appropriate parties, maintained calendar of critical dates and deadlines, and reviewed and followed up on various open case issues.

Fees: \$1,696.00                      Hours: 1.80

**B. Compensation of Professionals**

14. During the Interim Period, the Firm, among other things, reviewed, revised and filed its interim fee application.

Fees: \$328.50                      Hours: .30

**C. Compensation of Professionals / Other**

15. During the Interim Period, the Firm, among other things, assisted with the preparation and filing of FTI's interim fee application, and reviewed monthly fee applications filed by the Debtor's professionals and prepared and filed certificates of no objection to previously filed monthly fee applications.

Fees: \$1,573.50

Hours: 1.30

**D. General Creditors' Committee**

16. During the Interim Period, the Firm, among other things, prepared for and attended a meeting with the Committee to discuss case status.

Fees: \$2,420.00

Hours: 2.00

**E. Plan and Disclosure Statement**

17. During the Interim Period, the Firm, among other things, (i) reviewed the Debtor's revised combined disclosure statement and plan of liquidation, (ii) reviewed the liquidation analysis, (iii) addressed solicitation issues; (iv) reviewed and analyzed comments from the US Trustee and other parties in interest; and (v) addressed plan release language issues.

Fees: \$16,693.50

Hours: 13.30

**Valuation of Services**

18. Attorneys and paraprofessionals of PSZJ expended a total 18.70 hours in connection with their representation of the Committee during the Interim Period, as follows:

<b>Name of Professional Individual</b>	<b>Position of the Applicant, Year of Obtaining License to Practice</b>	<b>Hourly Billing Rate</b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Bradford J. Sandler	Partner 1996	\$1,595.00	2.80	\$4,466.00

<b>Name of Professional Individual</b>	<b>Position of the Applicant, Year of Obtaining License to Practice</b>	<b>Hourly Billing Rate</b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Paul John Labov	Partner, 2002	\$1,295.00	6.40	\$8,288.00
Colin R. Robinson	Counsel, 1997	\$1,095.00	8.80	\$9,636.00
Ian Densmore	Paralegal	\$545.00	0.20	\$109.00
Andrea R. Paul	Case Management Assistant	\$425.00	0.10	\$42.50
Karen S. Neil	Case Management Assistant	\$425.00	0.40	\$170.00

**Grand Total:           \$22,711.50**  
**Total Hours:           18.70**  
**Blended Rate:         \$1,214.50**

19. The nature of work performed by these persons is fully set forth in **Exhibit A** attached hereto. These are PSZJ's normal hourly rates for work of this character. The reasonable value of the services rendered by PSZJ for the Committee during the Interim Period is \$22,711.50.

20. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, it is respectfully submitted that the amount requested by PSZJ is fair and reasonable given (a) the complexity of this case, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under the Bankruptcy Code. Moreover, PSZJ has reviewed the requirements of Del. Bankr. LR 2016-2 and the Administrative Order and believes that this Application complies with such Rule and Order.

WHEREFORE, PSZJ respectfully requests that, for the period of April 1, 2023 through April 30, 2023, (i) an interim allowance be made to PSZJ for compensation in the amount \$22,711.50 and actual and necessary expenses in the amount of \$42.30 for a total allowance of

\$35,626.80 and (ii) payment of \$18,169.20 (80% of the allowed fees pursuant to the Administrative Order) and reimbursement of \$42.30 (100% of the allowed expenses pursuant to the Compensation Procedures Order) for a total payment of \$18,211.50, and for such other and further relief as this Court may deem just and proper.

Dated: June 30, 2023

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Colin R. Robinson

Robert J. Feinstein (admitted *pro hac vice*)

Bradford J. Sandler (DE Bar No. 4142)

Colin R. Robinson (DE Bar No. 5524)

919 N. Market Street, 17th Floor

Wilmington, DE 19801

Telephone: (302) 652-4100

Facsimile: (302) 652-4400

Email: rfeinstein@pszjlaw.com

bsandler@pszjlaw.com

crobenson@pszjlaw.com

*Counsel to the Official Committee of Unsecured  
Creditors*

**DECLARATION**

STATE OF DELAWARE :  
:  
COUNTY OF NEW CASTLE :

Bradford J. Sandler, after being duly sworn according to law, deposes and says:

a) I am a partner with the applicant law firm Pachulski Stang Ziehl & Jones LLP, and am admitted to appear before this Court.

b) I am familiar with the legal services rendered by PSZJ as counsel to the Committee.

c) I have reviewed the foregoing Application and the facts set forth therein are true and correct to the best of my knowledge, information and belief. Moreover, I have reviewed Del. Bankr. LR 2016-2, the Administrative Order signed on or about August 3, 2022 and submit that the Application substantially complies with such rule and orders.

/s/ Bradford J. Sandler

Bradford J. Sandler

## **EXHIBIT A**

**April 1, 2023 – April 30, 2023 Invoice**

**Pachulski Stang Ziehl & Jones LLP**

919 North Market Street  
17th Floor  
Wilmington, DE 19801

April 30, 2023

Invoice 132527

Client 02312

Matter 00002

**CRR**

CRR

RE: Committee Representation

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**STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 04/30/2023**

FEES \$22,711.50

EXPENSES \$42.30

**TOTAL CURRENT CHARGES** **\$22,753.80**

**BALANCE FORWARD** **\$148,604.44**

**LAST PAYMENT** **\$32,219.60**

**TOTAL BALANCE DUE** **\$139,138.64**

Pachulski Stang Ziehl & Jones LLP  
Agway Farms O.C.C.  
02312 -00002

Page: 2  
Invoice 132527  
April 30, 2023

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**Summary of Services by Professional**

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
ARP	Paul, Andrea R.	Case Man. Asst.	425.00	0.10	\$42.50
BJS	Sandler, Bradford J.	Partner	1595.00	2.80	\$4,466.00
CRR	Robinson, Colin R.	Counsel	1095.00	8.80	\$9,636.00
IDD	Densmore, Ian	Paralegal	545.00	0.20	\$109.00
KSN	Neil, Karen S.	Case Man. Asst.	425.00	0.40	\$170.00
PJL	Labov, Paul John	Partner	1295.00	6.40	\$8,288.00
				<hr/> 18.70	<hr/> \$22,711.50



Pachulski Stang Ziehl & Jones LLP  
Agway Farms O.C.C.  
02312 -00002

Page: 3  
Invoice 132527  
April 30, 2023

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**Summary of Services by Task Code**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
CA	Case Administration [B110]	1.80	\$1,696.00
CP	Compensation Prof. [B160]	0.30	\$328.50
CPO	Comp. of Prof./Others	1.30	\$1,573.50
GC	General Creditors Comm. [B150]	2.00	\$2,420.00
PD	Plan & Disclosure Stmt. [B320]	13.30	\$16,693.50
		18.70	<hr/> \$22,711.50

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Agway Farms O.C.C.  
02312 -00002

Page: 4  
Invoice 132527  
April 30, 2023

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**Summary of Expenses**

<u>Description</u>	<u>Amount</u>
Pacer - Court Research	\$23.90
Postage [E108]	\$2.00
Reproduction/ Scan Copy	\$16.40
	<hr/>
	\$42.30

Pachulski Stang Ziehl & Jones LLP  
 Agway Farms O.C.C.  
 02312 -00002

Page: 5  
 Invoice 132527  
 April 30, 2023

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Case Administration [B110]</b>						
04/03/2023	PJL	CA	Review Correspondence and discuss same with C. Robinson.	0.60	1295.00	\$777.00
04/05/2023	KSN	CA	Maintain document control.	0.10	425.00	\$42.50
04/11/2023	KSN	CA	Maintain document control.	0.20	425.00	\$85.00
04/11/2023	CRR	CA	Meeting w/ FTI, BSandler, PLabov re case status.	0.40	1095.00	\$438.00
04/17/2023	BJS	CA	Review agenda and discuss with CR	0.10	1595.00	\$159.50
04/18/2023	IDD	CA	Review docket to update Critical Dates Memorandum (.1); advise attorneys of upcoming deadlines (.1)	0.20	545.00	\$109.00
04/19/2023	KSN	CA	Maintain document control.	0.10	425.00	\$42.50
04/28/2023	ARP	CA	Maintain document control.	0.10	425.00	\$42.50
				<b>1.80</b>		<b>\$1,696.00</b>
<b>Compensation Prof. [B160]</b>						
04/25/2023	CRR	CP	Review, revise inteirm fee application and send to IDensmore for filing.	0.30	1095.00	\$328.50
				<b>0.30</b>		<b>\$328.50</b>
<b>Comp. of Prof./Others</b>						
04/12/2023	BJS	CPO	Review MJ fee applications	0.10	1595.00	\$159.50
04/27/2023	CRR	CPO	Confer w/ IDensmore re FTI interim fee applications, review updated draft and confirm re filing.	0.80	1095.00	\$876.00
04/27/2023	CRR	CPO	Review CNO's re PSZJ, FTI fee applications and email to IDensmore re filing.	0.20	1095.00	\$219.00
04/28/2023	BJS	CPO	Review FTI fee application	0.10	1595.00	\$159.50
04/28/2023	BJS	CPO	Review Staffing Report	0.10	1595.00	\$159.50
				<b>1.30</b>		<b>\$1,573.50</b>
<b>General Creditors Comm. [B150]</b>						
04/06/2023	CRR	GC	Emails re scheduling, meeting w/ Committee and updates.	0.20	1095.00	\$219.00

Pachulski Stang Ziehl & Jones LLP  
 Agway Farms O.C.C.  
 02312 -00002

Page: 6  
 Invoice 132527  
 April 30, 2023

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/12/2023	BJS	GC	UCC Call	0.30	1595.00	\$478.50
04/12/2023	CRR	GC	Attend meeting with Committee.	0.40	1095.00	\$438.00
04/12/2023	CRR	GC	Prepare agenda re meeting and prepare for meeting with Committee.	0.70	1095.00	\$766.50
04/12/2023	PJL	GC	Committee call.	0.40	1295.00	\$518.00
				<b>2.00</b>		<b>\$2,420.00</b>

### **Plan & Disclosure Stmt. [B320]**

03/17/2023	CRR	PD	Review Debtor plan comments and BSandler responses.	0.90	1095.00	\$985.50
04/01/2023	BJS	PD	Various emails with CR regarding plan issues	0.20	1595.00	\$319.00
04/01/2023	BJS	PD	Review revised liquidation analysis; Various emails with N Ganti regarding same	0.30	1595.00	\$478.50
04/03/2023	BJS	PD	Review Exclusivity Motion	0.10	1595.00	\$159.50
04/03/2023	BJS	PD	Various emails with Debtors regarding solicitation	0.10	1595.00	\$159.50
04/03/2023	CRR	PD	Initial review of solicitation motion, solicitation procedures and email with MDavis.	1.10	1095.00	\$1,204.50
04/03/2023	CRR	PD	Review, consider issues re exclusivity extension and respond to MDavis.	0.50	1095.00	\$547.50
04/06/2023	BJS	PD	Various emails with CR regarding plan	0.10	1595.00	\$159.50
04/06/2023	CRR	PD	Review liquidation analysis.	0.80	1095.00	\$876.00
04/06/2023	PJL	PD	Follow up on plan and disclosure statement, revisions to same, including liquidation analysis.	0.40	1295.00	\$518.00
04/07/2023	PJL	PD	Conference with B. Sandler regarding timing of plan and disclosure statement.	0.40	1295.00	\$518.00
04/10/2023	BJS	PD	Teleconference with CR regarding liquidation analysis; Various emails with CR regarding same	0.20	1595.00	\$319.00
04/10/2023	CRR	PD	Review current draft of liquidation analysis.	0.40	1095.00	\$438.00
04/10/2023	PJL	PD	Correspondence regarding plan and disclosure statement.	0.40	1295.00	\$518.00
04/10/2023	PJL	PD	Review liquidation analysis and internal discussion regarding same.	0.60	1295.00	\$777.00
04/11/2023	BJS	PD	Teleconference with FTI/PSZJ regarding liquidation	0.30	1595.00	\$478.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			analysis, plan discussion			
04/11/2023	PJL	PD	Attend call on FTI liquidation analysis and follow up with C. Robinson.	0.80	1295.00	\$1,036.00
04/13/2023	PJL	PD	Review United States Trustee Comments and internal follow up.	0.40	1295.00	\$518.00
04/14/2023	PJL	PD	Follow up internally regarding United States Trustee requests.	0.20	1295.00	\$259.00
04/17/2023	CRR	PD	Telephone conference with Hub Group re Plan issues.	0.40	1095.00	\$438.00
04/19/2023	BJS	PD	Various emails with PL regarding plan issues	0.20	1595.00	\$319.00
04/19/2023	CRR	PD	Review analysis from FTI re Plan and confer w/ NGanti.	0.30	1095.00	\$328.50
04/19/2023	PJL	PD	Review correspondence from various parties in interest on plan and disclosure statement.	0.40	1295.00	\$518.00
04/21/2023	BJS	PD	Various emails with PSZJ regarding release language	0.30	1595.00	\$478.50
04/21/2023	CRR	PD	Review, analysis re Hub Group edits to Plan.	1.40	1095.00	\$1,533.00
04/21/2023	PJL	PD	Review HUB Comments and plan and discussion with C. Robinson regarding same.	1.20	1295.00	\$1,554.00
04/24/2023	PJL	PD	Conference with B. Sandler regarding update to timing on plan and disclosure statement.	0.30	1295.00	\$388.50
04/27/2023	PJL	PD	Review updated liquidation analysis.	0.30	1295.00	\$388.50
04/28/2023	BJS	PD	Review liquidation analysis; Various emails with FTI regarding same	0.30	1595.00	\$478.50
				<b>13.30</b>		<b>\$16,693.50</b>
<b>TOTAL SERVICES FOR THIS MATTER:</b>						<b>\$22,711.50</b>

Pachulski Stang Ziehl & Jones LLP  
Agway Farms O.C.C.  
02312 -00002

Page: 8  
Invoice 132527  
April 30, 2023

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**Expenses**

04/20/2023	PO	DE Postage	2.00
04/27/2023	RE2	SCAN/COPY ( 2 @0.10 PER PG)	0.20
04/27/2023	RE2	SCAN/COPY ( 2 @0.10 PER PG)	0.20
04/27/2023	RE2	SCAN/COPY ( 2 @0.10 PER PG)	0.20
04/27/2023	RE2	SCAN/COPY ( 2 @0.10 PER PG)	0.20
04/28/2023	RE2	SCAN/COPY ( 156 @0.10 PER PG)	15.60
04/30/2023	PAC	Pacer - Court Research	23.90
<b>Total Expenses for this Matter</b>			<b>\$42.30</b>

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 02312 -00002

Page: 9  
 Invoice 132527  
 April 30, 2023

# REMITTANCE ADVICE

Please include this Remittance with your payment

For current services rendered through: 04/30/2023

Total Fees \$22,711.50

Total Expenses 42.30

Total Due on Current Invoice \$22,753.80

Outstanding Balance from prior invoices as of 04/30/2023 (May not include recent payments)

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
132071	03/28/2023	\$72,681.00	\$71.34	\$72,752.34
132072	03/28/2023	\$40,028.50	\$196.80	\$8,005.70
132316	03/31/2023	\$35,514.50	\$112.30	\$35,626.80

Total Amount Due on Current and Prior Invoices: \$139,138.64